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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BFP INVESTMENTS 4, LLC,

Plaintiff,

vs.

NATIONSTAR MORTGAGE LLC, d/b/a MR.
COOPER; QUALITY LOAN SERVICE
CORPORATION; DOES 1-10; ROE
ENTITIES 1-10,

Defendants.

Case No. 2:22-CV-00287-JAD-DJA

**STIPULATION AND ORDER TO EXTEND
EXPERT DISCLOSURE DEADLINE**

(First Request)

The parties, by and through their undersigned counsel, stipulate and agree as follows:

**A. A statement specifying the discovery completed by the parties as of the date of
the motion or stipulation**

SFR and Nationstar have exchanged initial disclosures and supplements.

SFR issued written discovery to Quality Loan Service Corporation. Quality responded.

SFR issued written discovery to Nationstar. Nationstar responded.

B. A specific description of the discovery that remains to be completed

Nationstar and/or Quality¹ issue written discovery

SFR's deposition

Nationstar's deposition

¹ On March 1, 2022, Quality filed a notice of non-monetary status. *See* ECF No. 8. On March 9, 2022, SFR filed an objection. *See* ECF No. 9. To date, the court has not ruled on the issue.

1 Quality's deposition

2 Disclosure of expert witnesses

3 **C. The reasons why the remaining discovery was not completed within the time**
4 **limit of the existing discovery deadline**

5 On August 29, 2022, SFR issued written discovery to Quality and Nationstar. However, on
6 October 3, 2022, Nationstar's counsel realized his office was not aware of the discovery; it only
7 came to his attention after BFP's counsel requested a copy be emailed. As a result, BFP granted
8 Nationstar a 30-day extension to respond to the written discovery. Thereafter, Nationstar requested
9 additional time to respond to written discovery, and BFP granted Nationstar two weeks, but
10 Nationstar did not provide its responses until November 18 and November 23. BFP was waiting
11 on this first phase of discovery before moving on to expert discovery.

12 **D. Excusable Neglect why request was not made 21-days before deadline.**

13 BFP did not receive Nationstar's written discovery responses until November 18 and
14 November 23. At the 21-day mark, (November 9, 2022) BFP was not aware Nationstar would not
15 be responding until November 18 and 23. Even with the additional two-week extension, the
16 deadline was November 17.

17 ///

D. A proposed schedule for the completion of all remaining discovery**Current Deadline****Proposed Deadline**

Discovery Cut-Off: February 28, 2023

No change

Amending/Adding Parties: September 12, 2022

No change

Initial Experts: November 30, 2022

December 14, 2022

Rebuttal Experts: December 30, 2022

January 17, 2022

Dispositive Motions: March 28, 2023

No change

Pre-Trial Order: ~~February 13, 2023~~

No Change

HANKS LAW GROUP**TROUTMAN PEPPER HAMILTON
SANDERS, LLP**/s/ Karen L. Hanks/s/ Brody R. Wight

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*Attorneys for BFP Investments 4, LLC**Attorneys for Nationstar Mortgage, LLC
dba Mr. Cooper***ORDER**

Having reviewed the parties' Stipulation, the Court finds that the pretrial order deadline is incorrect. The deadline for filing the joint pretrial order is 30 days after the dispositive-motion deadline. Accordingly, the stipulation is **granted in part** and **denied in part**. The deadline within which to file the pretrial order is **April 27, 2023**. If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order. IT IS SO ORDERED.

DATED this 9th day of December 2022.

DANIEL J. ALBREGTS
 UNITED STATES MAGISTRATE JUDGE